

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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INTELLECTUAL VENTURES II LLC,  
Plaintiff,

v.

DENSO CORPORATION, AND  
DENSO INTERNATIONAL AMERICA, INC.,

Defendants.

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Civil Action No.

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT**

Intellectual Ventures II LLC (“IV” or “Plaintiff”), brings this action for patent infringement against Defendants Denso Corporation and Denso International America, Inc. (“Denso” or “Defendants”), and alleges as follows:

**NATURE OF THE ACTION**

1. This is an action for patent infringement under the patent laws of the United States, Title 35 of the United States Code. IV seeks remedies for Defendants’ infringement of IV’s U.S. Patent No. 7,067,952 (“the ’952 Patent” or the “Patent-in-Suit”).

**THE PARTIES**

2. Intellectual Ventures II LLC is a Delaware limited liability company, with a principal place of business at 3150 139th Ave. SE, Bldg. 4, Bellevue, WA 98005.

3. Upon information and belief, Denso Corporation is a corporation organized and existing under the laws of Japan, with its principal place of business at 1-1, Showacho, Kariya, Aichi, 448-0029, Japan.

4. Upon information and belief, Denso International America, Inc. is a Michigan corporation headquartered at 24777 Denso Drive, Southfield, MI 48033.

### **JURISDICTION AND VENUE**

5. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
6. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
7. Venue in this district is proper under 28 U.S.C. §§ 1400(b) and 1391(b) and (c).
8. This Court has personal jurisdiction over Denso by virtue of, *inter alia*, (i) maintaining a regular place of business and a continuing presence in this jurisdiction; (ii) committing at least a portion of the infringements alleged herein within this district; and (iii) regularly doing business or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in this district.

### **THE PATENT**

9. United States Patent No. 7,067,952 is entitled “Stator assembly made from a molded web of core segments and motor using same,” and issued June 27, 2006 to inventor Griffith D. Neal. The ’952 Patent issued from United States Patent Application No. 10/383,219 filed on March 5, 2003. The ’952 Patent claims priority to U.S. Patent No. 7,036,207 filed on March 2, 2001. A copy of the ’952 Patent is attached as Exhibit 1.

10. IV is the lawful assignee and owner of all right, title, and interest in and to the ’952 Patent.

### **INFRINGEMENT OF THE PATENT-IN-SUIT**

11. Denso has infringed and continues to infringe at least one of IV’s patents that cover aspects of electric motors and other products, including, without limitation the Denso Power Steering Motor with Toyota part number 89650-33680 (the “Exemplary Denso Product”).

12. IV incorporates by reference in its allegations herein certain claim charts comparing exemplary claims of the Patent-in-Suit to the Exemplary Denso Product.

13. Specifically, Exhibit 2 is a chart comparing claims of the Patent-in-Suit to the Exemplary Denso Product.

14. As set forth in Exhibit 2, the Exemplary Denso Product practices, in whole or in material part, the technology claimed by the Patent-in-Suit.

### **COUNT I**

#### **(Denso's Infringement of the '952 Patent)**

15. Paragraphs 1 through 14 are incorporated by reference as if fully restated herein.

16. IV is the assignee and lawful owner of all right, title and interest in and to the '952 Patent.

17. The '952 Patent is valid and enforceable.

18. Denso has infringed, and is still infringing, the '952 Patent in at least this District by making, using, offering to sell, selling and/or importing Accused Products that infringe at least claims 10 and 12 of the '952 Patent (the "Exemplary '952 Patent Claims") literally or by the doctrine of equivalents.

19. On information and belief, Denso directly infringes the '952 Patent by designing, manufacturing, and selling the Exemplary Denso Product.

20. Exhibit 2 includes a chart comparing exemplary claims 10 and 12 of the '952 Patent to the Exemplary Denso Product. As set forth in these charts, the Exemplary Denso Product practices, in whole or in material part, the technology claimed by the '952 Patent. Accordingly, the Exemplary Denso Product infringes at least exemplary claims 10 and 12 of the '952 Patent.

21. IV is entitled to recover damages adequate to compensate for Denso's infringement.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests the following relief:

- a) A judgment that the '952 Patent is valid and enforceable.
- b) A judgment that Defendants have infringed one or more claims of the '952 Patent;  
and
- g) A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284 for Defendants' past infringement, and any continuing or future infringement of the Patents-in-Suit, up until the date such judgment is entered, including pre or post judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284 and, if necessary, to adequately compensate Plaintiff for Defendants' infringement, an accounting:
  - i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285 and that Plaintiff be awarded its reasonable attorneys' fees against Defendants that it incurs in prosecuting this action;
  - ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this action; and
  - iii. that Plaintiff be awarded such further relief at law or in equity as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands trial by jury on all claims and issues so triable.

Dated: March 20, 2017

Respectfully submitted,

Of Counsel:

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